

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

— v. —

BRIAN SWIENCINSKI, ET AL.

Defendants.

No. 4:18-cr-00368

MOTION TO MAINTAIN FILING UNDER SEAL AND EX PARTE

Defendants Brian Swiencinski, Scott Breimeister, and Ronnie McAda, Jr. (“Defendants”) respectfully move this Court for an order directing the Clerk of Court to maintain under seal and ex parte the Defendants’ Motion for Omnibus Relief and attachments, filed near-contemporaneously with this motion at Dkt. 385. This request comes because the Motion for Omnibus Relief reveals sensitive and critical defense strategies.

December 13, 2022

Respectfully submitted,

/s/ Josh Schaffer

Josh Schaffer
State Bar No. 24037439
1021 Main, Suite 1440
Houston, Texas 77002
(713) 951-9555
(713) 951-9854 (facsimile)
josh@joshschafferlaw.com

Dan Cogdell
State Bar No. 04501500
Jones Walker
811 Main Street, Suite 2900
Houston, TX 77002
713.437.1869
713.437.1810 (facsimile)
dcogdell@joneswalker.com

Attorneys for Scott Breimeister

/s/ Brandon McCarthy

Brandon McCarthy (admitted pro hac vice)
Attorney-in-Charge
State Bar No. 24027486
Rachel M. Riley
State Bar No. 24093044
S.D. Bar No. 2810706
KATTEN MUCHIN ROSENMAN LLP
2121 N. Pearl Street, Suite 1100
Dallas, TX 75201
Telephone: 214-765-3600
Facsimile: 214-765-3602
brandon.mccarthy@katten.com
rachel.riley@katten.com

Mary C. Fleming (admitted pro hac vice)
KATTEN MUCHIN ROSENMAN LLP
2900 K Street NW, North Tower - Suite 200
Washington, DC 20007-5118
Telephone: 202-625-3754
mary.fleming@katten.com

/s/ Jeff Ansley
Jeffrey J. Ansley
Texas Bar No. 00790235
jansley@vedderprice.com
Arianna G. Goodman
Texas Bar No. 24109938
agoodman@vedderprice.com
Samuel M. Deau
S.D. Tex. No. 3791231
sdeau@vedderprice.com
Vedder Price, P.C.
100 Crescent Court, Suite 350
Dallas, Texas 75201
(469) 895-4790

Attorneys for Ronnie McAda Jr.

Michael A. Villa, Jr.
State Bar No. 24051475
S.D. Federal ID No. 3256126
MEADOWS, COLLIER, REED,
COUSINS, CROUCH & UNGERMAN, LLP
901 Main Street, Suite 370
Dallas, TX 75202
Telephone: 214-744-2700
mvilla@meadowscollier.com

Scottie D Allen (admitted pro hac vice)
THE ALLEN LAW FIRM
4144 N. Central Expressway
Suite 650
Dallas, TX 75204
(214) 824-7711
scottiedallen@scottiedallenlaw.com

Attorneys for Brian Swiencinski

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Motion to Seal to be served on all counsel of record by filing it with the Clerk on December 13, 2022, using the Court's CM/ECF System.

/s/ Brandon McCarthy
Brandon McCarthy
(admitted *pro hac vice*)